

EXHIBIT B

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By Hand Delivery

February 24, 2020

Clerk of the Court, Ruby J. Krajick
United States District Court
Southern District of New York
Office of the Clerk
500 Pearl Street
New York, New York 10007

Re: *Deborah Bodner et al. v. Islamic Republic of Iran,*
Case No.: 1:19-cv-11776 (GBD) (SN); RE: Service

Dear Clerk of the Court, Ruby J. Krajick:

I represent the Plaintiffs in the above-referenced action.

I am writing to request you effect service on the Defendant, Islamic Republic of Iran, pursuant to 28 U.S.C. §1608(a)(4), at the following address:

Minister of Foreign Affairs
Ministry of Foreign Affairs of the Islamic Republic of Iran
Iman Khomeini Avenue
Tehran, Iran
ATTN: H.E. Mohammad Javad Zarif

Service on Iran cannot be effected under 28 U.S.C. Sections 1608(a)(1) and (2) because the United States and Iran do not have any special arrangement for service of process upon Iran in accordance with sub-section (1), nor is service permitted by any applicable international convention under the provisions of sub-section (2).¹ See *Valore v. Islamic Republic of Iran*, 700 F. Supp. 2d 52, 70 (D.D.C. 2010).

On January 23, 2020, Plaintiffs, through the Clerk of the Court, attempted to serve Defendant pursuant to the provision to 28 U.S.C. §1608(a)(3). Annexed hereto as **Exhibit 1**, is a copy of the certificate of mailing.

As of Monday, February 24, 2020, over thirty (30) days passed since the certificate of mailing has been issued and service had not been able to be completed

¹ Iran is not a signatory to the convention of the Service Abroad of Judicial and Extrajudicial Documents in Civil or Commercial Matters.

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under 28 U.S.C. § 1608(a)(3). Annexed hereto as **Exhibit 2**, is a true and correct copy of the USPS tracking information of the package sent by the Clerk of the Court indicating that serve has not been made. .

Accordingly please serve Defendant pursuant to 28 U.S.C. §1608(a)(4) at the following address:

U.S. Department of State
SA-29, 4th Floor, 2201 C Street NW
Washington, DC 20520.
Attn: Secretary of State, Director of Consular Services, Office of Policy Review and Inter-Agency Liaison (CA/OCS/PRI),

Enclosed please find copies of the following documents:

1. Summons
2. Complaint deemed filed on December 27, 2019
3. Civil Cover Sheet
4. Notice of suit prepared in accordance with 22 CF § 93.2 with a copy of 28 U.S.C. 1330
5. Affidavit of translator (along with translations of the above documents)²

In total, we are providing three complete sets of the documents, in both English and Farsi. In accordance with pages 12-13 of the Court's Foreign Mailing Instructions we are providing two sets for service on Defendant and a set of documents for the Court's file.

We have also enclosed pre-paid FedEx label and envelope for delivery to the address above. Please note that our firm FedEx account number is 628354049.

We further enclose a cashier's check in the amount of \$2,275.00 made payable to "U.S. Embassy Bern."

Should you have any questions or require any additional information please do not hesitate to contact me.

Regards,

Jerry S. Goldman

Enclosures

² The affidavit of the translator comports with the requirements of NY CPLR 2101(b).

EXHIBIT 1

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

BODNER ET AL.,

Plaintiffs,

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

CERTIFICATE OF MAILING

Case No.: 19-cv-11776 (GBD) (SN)

I hereby certify under the penalties of perjury that on the 23rd day of January, 2020, I served:

Minister of Foreign Affairs

Ministry of Foreign Affairs of the Islamic Republic of Iran

Imam Khomeini Avenue

Tehran Iran

Attn: H.E. Mohammad Javad Zarif

the head of the ministry of foreign affairs, pursuant to the provisions of the Foreign Sovereign Immunities Act, 28 U.S.C. § 1608(a)(3).

Two (2) copies of the Summons, Compliant filed December 27th, 2019, Civil Cover Sheet, Notice of Suit with copy of 28 U.S.C. 1330; (along with attached affidavit of translator and Farsi translations of the above documents), by USPS Reg. Mail no. RH002019305US

Dated: New York, New York
January 23, 2020

RUBY J. KRAJICK
CLERK OF COURT

/s/Shanee Mcleod
Deputy Clerk

To Be Completed By Customer (Please Print)		To Be Completed By Post Office	
All Entries Must Be in Ballpoint or Type			
<input type="checkbox"/> Return Receipt	\$ 34.75	<input type="checkbox"/> Extra Services & Fees <small>(Continued)</small>	<input type="checkbox"/> Signature Confirmation
<input type="checkbox"/> Registered Mail \$	\$ 16.00	<input type="checkbox"/> Restricted Delivery	<input type="checkbox"/> Domestic Insurance up to \$50.00 is included based upon the declared value. International insurance is not included.
<input type="checkbox"/> Restricted Delivery \$	\$ 44.10	<input type="checkbox"/> Total Postage & Fees \$ 54.85	
Customer Must Declare Full Value	\$ 0.00	Received by 01/22/2020	
TO		RE 296 037 892 US	
JERRY GOLDMAN ANDERSON KILL PC 1251 AVENUE OF THE AMERICAS NEW YORK, NY 10020 MINISTER OF FOREIGN AFFAIRS MINISTRY OF FOREIGN AFFAIRS OF IRAN IMAM KHOMEINI AVENUE ATTN: MOHAMMED TEHRAN, IRAN			

PS Form 3806, Registered Mail Receipt
April 2015, PSN 7530-02-000-9051
For domestic delivery information, visit our website at www.usps.com

(See Information on Reverse)



USPS Customs Declaration and Dispatch Note

- Print in English using blue or black ink.
- Complete all SHADED fields before acceptance.
- See the Privacy Notice on the reverse of Copy 4.

SHIPMENT INFORMATION (CONTINUED) — BOXED AREA IS FOR USPS-USE ONLY

Last Name	Full First Name	MI	USPS Official Use	USPS Corporate Account	EMS Scheduled Delivery Date
Business Name (if applicable)			Sender's Telephone	Total Postage/Fees (U.S. \$)	Insured Value (U.S. \$)
Address-1			7. Sender's Email Address	8. Addressee's Email Address	
Address-2			9. Exporter's Reference (if applicable and known)	10. Importer's Telephone (if applicable and known)	
State ZIP Code*			11. Importer's Reference (if applicable and known)	12. Importer's Telephone (if applicable and known)	
ADDRESSEE'S INFORMATION			13. AES ITIN (if applicable)	14. AES Exemption — NOEELS (Check one if applicable) <input type="checkbox"/> § 30.36 <input type="checkbox"/> § 30.37 (a) <input type="checkbox"/> § 30.37 (h) <input type="checkbox"/> § 30.37 (v) <input type="checkbox"/> Other	
Business Name (if applicable)			15. License Number (if applicable)	16. Certificate Number (if applicable)	17. Invoice Number (if applicable)
Address-1			18. Length (inches)	19. Width (inches)	20. Height (inches)
Address-2			Postal Code	21. Restrictions (if applicable — check all that apply)	22. Nondelivery Instructions (Check one) <input checked="" type="checkbox"/> Return to Sender <input type="checkbox"/> Treat as Abandoned
City State/Province Country			23. Sender's Signature and Date		
SHIPMENT INFORMATION 1. Category of Items (Check all that apply) <input type="checkbox"/> Document <input type="checkbox"/> Commercial Sample <input type="checkbox"/> Merchandise <input type="checkbox"/> Dangerous Goods <input type="checkbox"/> Gift <input type="checkbox"/> Returned Goods <input type="checkbox"/> Humanitarian Donation <input type="checkbox"/> Other					
I certify the particulars given in this customs declaration are correct. This package does not contain any undeclared dangerous items, or items prohibited by legislation or by postal or customs regulations. I have met all applicable export filing requirements under federal law and regulations.					
2. Detailed Description of Contents (Enter only one item per line)		3. Quantity	4. Net Weight (lb.)	5. Value (ea.)	For Business Mailers, for items in Block 2 (if the information is known)
Sample of Compliant Commercial Sample		1	0.5	4	24. HS Tariff Number
All Mail		1	0.5	4	25. Country of Origin
Return to Sender		1	0.5	4	
Total					

EXHIBIT 2

USPS Tracking®

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**Track Packages
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</xsell?app=UspsTools&ref=homepageBanner&appURL=https%3A%2F%2Finformeddelivery.usps.com/box/pages/intro/start.action>

Tracking Number: RH002019305US

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